

*United States Attorney
Southern District of New York*

July 12, 2023

BY ECF

The Honorable Katherine Polk Failla
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Pierre Girgis*, 22 Cr. 6 (KPF)

Dear Judge Failla:

With the consent of the defense, the Government writes to seek a three-week adjournment of its deadline to oppose the defendant's motion to compel. This is the Government's first request for an adjournment of the briefing schedule.

On March 21, 2023, the Court endorsed an adjournment request by the defense on consent to extend the briefing schedule on the defendant's motion to compel. *See* Dkt. 34. At present, the Government's opposition is due July 14, 2023, and the defendant's reply is due August 11, 2023. *Id.* The Government seeks an adjournment of that schedule for three additional weeks to finalize its submission, including necessary coordination with relevant U.S. Government agencies and components. The Government proposes, therefore, that the Government's submission be due August 4, 2023, and the defendant's reply be due September 1, 2023. Counsel for the defendant consents to this request.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: /s/
 Kyle A. Wirshba / Elinor L. Tarlow /
 Sarah L. Kushner
 Assistant United States Attorneys
 (212) 637-2493 / 1036 / 2676

cc: All counsel (by ECF)